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March 31, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED in part and DENIED in part. Defendants'
Opposition is due **April 22, 2020**. Plaintiff's Reply is due **April 30, 2020**.

Dated: April 1, 2020
New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

RE: **Gold Medal Produce, Inc. v. Duong et al**
DOCKET NO.: 19-cv-04043
Request For 45 Day Extension To File Opposition
To Plaintiff's Summary Judgment Motion

Dear Judge Schofield:

We represent the Defendants HUNG DUONG and LIEN LUONG in the above-referenced action. Defendants write this letter to request a 45 day extension for Defendants to file Opposition to Plaintiff's motion for Summary Judgment. Defendant's Opposition is currently due on April 8, 2020, granting this extension would make Defendant's opposition due on May 22, 2020. No previous requests for an extension have been made.

Defendants request this extension in time to file opposition because the ongoing pandemic and the Governors ongoing Order requiring non-essential personnel to shelter in place and work remotely, has resulted in my office being unable to get in touch with our clients in this matter, and as such prevented my office from preparing opposition.

It is our hope that this requested extension will allow sufficient time for the pandemic restrictions for New York to pass and my office to regain contact with our clients.

We have reached out to opposing counsel, and he does not consent to this request. The reason provided for not consenting was that "[t]he virus is not affecting email, telephones, and the US mail" and that his moving papers were served "before the order to which you refer."

If Defendants' request for an extension is granted. This would also effect Plaintiff's deadline to reply, which would need to be extended to June 1, 2020. No other scheduled deadlines should be effected.

We thank Your Honor for your time and consideration in this matter.

Respectfully submitted,
LAW OFFICES OF VINCENT S. WONG

/s/ *Michael Brand*
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CC:
LAW OFFICE OF BRUCE LEVINSON (via ECF)